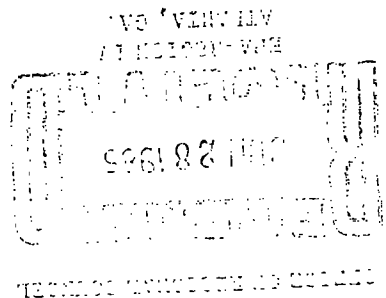


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June 28, 1985

Mr. Kirk R. McFarlane
Assistant Regional Counsel
U. S. Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, GA 30365

Re: Medley Site - County Road 72
(Burnt Gin Road)

Dear Mr. McFarlane:

This is in response to your letter dated May 30, 1985, which we did not receive until June 10, 1985.

Based upon the information contained in your May 30 letter and on our ongoing investigation of this matter, we now understand that the Medley Site to which EPA referred in its earlier letter dated October 25, 1983 was not the South Carolina DHEC approved landfill owned and operated by Medley's Concrete Works, but rather, a farm owned by Ralph Medley, and apparently used for certain waste handling activities. Accordingly, our response of November 28, 1983 needs to be clarified. The "Medley Farm site" to which we referred in our November 28 letter was assumed by us to be the approved landfill operated by Medley's Concrete Works and not Ralph Medley's farm which EPA cleaned up. We are not sure whether this is the site referred to in your recent letter as the "Love Springs" site, but, based on your description of it, it is possible that they are one and the same.

In any event, we are concerned over the statement referred to in EPA's letter that our company may have been the principal contributor of waste substances deposited at the site. We do not believe that is true since we believe our waste went to the approved landfill site. Nevertheless, assuming some of our waste was deposited at the Medley Farm site (although we have seen nothing to evidence this fact), since none of it was hazardous, it would not have contributed to any conditions warranting EPA's emergency removal activities. EPA's cleanup contractor should have records of testing of the contents of CST drums, if any,

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Mr. Kirk R. McFarlane
Assistant Regional Counsel
U. S. Environmental Protection Agency
June 28, 1985

found at the farm site. This is certainly the best evidence that this waste was, in fact, non-hazardous. As you know, we were not notified by EPA of this cleanup until after the fact and therefore were not given the opportunity to perform such testing ourselves.

The following responses are submitted to the numbered questions in your May 30, 1985 letter:

1. Yes.
2. Supplementing our letter dated November 28, 1983, the Charles S. Tanner Co. ("CST"), which we acquired from CIBA-GEIGY Corporation in 1980, arranged with Medley's Concrete Works, Rt. 7, Gaffney, SC for the shipment during 1974 through 1976 of a number of drums of non-hazardous, aqueous emulsion waste to a landfill, approved by South Carolina DHEC, owned by and located near Medley's Concrete Works. Ray Paradowski, then an employee of CST, believes that such arrangements were made with representatives of Medley Concrete Works. It was CST's understanding at that time that all such waste was disposed of at such approved landfill.
3. Yes. This response is based on the assumption that the Love Springs site is the same approved landfill site referred to in our response to question No. 2. The name "Love Springs" was not known to CST employees at that time. Based on my recent telephone conversation with you it is not clear that the Love Springs site is the landfill site referred to in response to No. 2 above.
4. See response #3 above and our letter dated November 28, 1983.
5. It was our belief at that time that the arrangements were carried out. On the basis of EPA's May 30 letter, it now appears that there is some question as to whether such arrangements were carried out as agreed.
6. None. All arrangements were made verbally.
7. N/A.
8. See No. 2 above.
9. No.
10. N/A.
11. See letter dated November 28, 1983, previously submitted.
12. See attached invoices. It was CST's understanding that all shipments of waste materials reflected in these invoices went to the DHEC approved landfill. To date we have seen no evidence that this was not the case.
13. Yes. From 1974-1976 as per attached invoices.

Mr. Kirk R. McFarlane
Assistant Regional Counsel
U. S. Environmental Protection Agency
June 28, 1985

Please let us know if we can be of any further assistance to you
in your investigation of this matter.

Very truly yours,

NATIONAL STARCH AND CHEMICAL CORPORATION

A handwritten signature in dark ink, appearing to read "A. M. Samson, Jr.", with a stylized flourish at the end.

A. M. Samson, Jr.
Counsel, Regulatory Affairs

AMS:KS
Attachment